

EXHIBIT 9

DENISE GEORGE Confidential
GOVT OF US VI V. JPMORGAN CHASE

July 17, 2023

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CONFIDENTIAL
UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK
CASE NUMBER: 22-CV-10904-JSR
ACTION FOR DAMAGES

GOVERNMENT OF THE UNITED STATES)
VIRGIN ISLANDS,)
)
Plaintiff,)
)
VS.)
)
JP MORGAN CHASE BANK, N.A.,)
)
Defendant.)
)

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VIDEO RECORDED DEPOSITION OF
DENISE GEORGE
MONDAY, JULY 17, 2023

REPORTED BY:

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1 or, you know, that sort of thing would
2 have been going on on the island.

3 Q. And then what did you do after
4 you found out it came back that there
5 were no complaints?

6 A. I just -- well, I guess
7 personally I didn't -- well, what I
8 did was at that point in time, I just
9 started to really read a lot of the --
10 of the reports, and it's -- it's news
11 media reports.

12 Which is fairly hearsay to
13 hear -- to just get the gist of what
14 is being said even though I know that
15 you can't -- I can't just rely on --
16 on news media. I can't do that.

17 You know, it's rumor,
18 innuendo. But to see where they're
19 getting this information from and
20 what's happening because it became
21 even more of a curiosity for me and
22 thinking this is something we -- we
23 got to do something about, you know.

24 I don't know what happened
25 then, but I can't sit here and hear

1 that all this happened, especially
2 when under our statutes, sexual
3 assaults and -- and child abuse are --
4 have no statute of limitations.

5 So it wouldn't have been too
6 late to do anything if we had solid
7 evidence, because I can't go by
8 innuendo. I can't go by rumor. I
9 can't go by media reports and say,
10 Okay, you know, let's, you know, do an
11 investigation.

12 And then I was also critically
13 short-staffed as well. I didn't have
14 the resources either. But it was
15 really where I was really
16 contemplating what can be done.

17 But once learning or
18 understanding that the federal
19 authorities were investigating
20 Mr. Epstein and prosecuting
21 criminally, and there was -- there
22 might have been a criminal
23 investigation going on.

24 That is something that I would
25 not do -- that it sort of preempts

1 going and doing something when once
2 the federal authorities or any other
3 authorities have started a criminal
4 investigation or that prosecutors.

5 They made the arrest. Then
6 that's sort of under, I think it's
7 called the First Forum Rule. It's --
8 it's like in respect to the other
9 forum, that you do not -- you know, we
10 won't go and, you know, start up a
11 prosecution when there's one already
12 there.

13 So it's been -- it pleased me
14 to see that something was being done
15 with law enforcement organization that
16 had the resources to be able to do it.
17 So once I learned that that was
18 happening. Okay, then at least
19 something is being done. There's a
20 prosecution.

21 And then I was very -- you
22 know, try to be in-tuned with what it
23 is and what the charges were once he
24 was arrested, and looking forward to
25 seeing Jeffrey Epstein brought to

1 justice. But also hearing more about
2 what happened and what part Little St.
3 James may have played in it.

4 Q. How did you learn that a
5 federal investigation was being
6 done?

7 A. I did not learn it for sure,
8 but I -- I don't recall exactly how --
9 there were certain questions that
10 might have been asked or something
11 that I -- I just sensed that there was
12 an investigation going on.

13 And I can't -- and it's not
14 something that I could -- would even
15 disclose, of course, even if I knew.
16 But I sensed that one was going on.

17 Q. Questions asked by who?

18 A. I can't tell you that. You
19 know, I mean, if there -- I just don't
20 recall exactly, but I think something
21 I read or something and in my mind I
22 said, Okay. That means that the
23 federal authorities must be
24 investigating.

25 That was my conclusion. It

1 ATTORNEY O'LAUGHLIN: Sure.

2 Yeah, let's do a few more
3 questions. Then we can take a
4 break.

5 (BY ATTORNEY O'LAUGHLIN):

6 Q. So just to be clear, you had a
7 sense there would be federal charges,
8 and that's what caused you to say,
9 Okay, Feds are on it; I can kind of
10 like focus elsewhere?

11 ATTORNEY ACKERMAN:

12 Objection --

13 THE WITNESS: No, that isn't
14 --

15 ATTORNEY ACKERMAN: Object to
16 form, misstates prior testimony.

17 THE WITNESS: Uh-huh. Yeah,
18 that's not -- yeah, that's not
19 what I said.

20 (BY ATTORNEY O'LAUGHLIN):

21 Q. Okay. What --

22 A. I said -- I did say that yes,
23 I did have a lunch. And I guess I
24 can't pinpoint exactly what it was,
25 but I knew that I had the sense that

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1 there was some federal investigation
2 that -- and but no, that doesn't mean
3 that I totally said, Okay. Well, I'm
4 not going to focus on anything else.

5 Although I did have a lot of
6 things to focus on. So that was not
7 the only thing I was focusing on as
8 Attorney General. But it -- it was --
9 it brought some satisfaction that
10 there would be light shed on what
11 happened and why maybe.

12 And that Jeffrey Epstein, if
13 it is at all that these allegations
14 are true or if they can be proven to
15 be true, that he would be brought to
16 justice or he could be brought to
17 justice.

18 But just the existence of an
19 investigation isn't going to tell me
20 that, Oh, well, everything is solved.
21 No. So it was still on my mind. But
22 to tell you the plain truth, we,
23 Department of Justice, didn't have the
24 resources to even launch an
25 investigation even if I wanted to

1 because the -- the investigative team
2 was very short-staffed as well as most
3 of the Department of Justice.

4 Q. Okay. And do you know when
5 you developed this hunch?

6 A. No. You mean a specific --
7 what are you asking for, a specific
8 date?

9 Q. Or an approximate date.

10 A. No. I guess it's -- I don't
11 think -- it's just a compilation of --
12 I guess I was -- no, I don't. I don't
13 know exactly when.

14 Q. Okay.

15 A. But I had been looking at a
16 lot of things, a lot of articles that,
17 you know, sent some information about
18 this. And I just -- somehow I started
19 to conclude and I have a feeling that
20 this might be happening, but...

21 Q. Okay. So --

22 A. I can't say exactly when that
23 happened.

24 Q. So going back to the original
25 question, which was the steps you took